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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 SAN FRANCISCO DIVISION

13 WAYMO LLC,

14 Plaintiff,

15 vs.

16 UBER TECHNOLOGIES, INC.;
17 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

18 Defendants.

CASE NO. 3:17-cv-00939

**PLAINTIFF WAYMO LLC'S RESPONSE
TO UBER'S SUBMISSION OF
PROPOSED DATES FOR TIMELINE**

The Court ordered that “[b]efore opening statements, counsel shall agree on a simple timeline” to be displayed at trial. (Dkt. 2250.) The parties have been meeting and conferring pursuant to that Order, but late last night, Defendants notified Waymo of their intention to file their proposed timeline with the Court in advance of the pretrial conference.¹ To the extent the Court is going to entertain this issue at pretrial conference, Waymo provides its own dates for the Court’s consideration, as well as a timeline graphic, attached hereto as **Exhibit A**.

Waymo’s Proposed Dates for Timeline:

- **September 2015** – Meetings begin between Ottomotto founders and Uber
- **December 11, 2015** – Anthony Levandowski accesses Google’s SVN server and downloads more than 14,000 files
- **January 15, 2016** – Ottomotto is formed
- **January 27, 2016** – Levandowski’s last day at Google
- **February 22, 2016** – Uber and Ottomotto sign Term Sheet
- **April 11, 2016** – Uber and Ottomotto sign Put Call agreement
- **August 5, 2016** – Stroz Friedberg issues investigation report
- **August 23, 2016** – Uber’s acquisition of Ottomotto closes
- **February 23, 2017** – Waymo files complaint
- **May 30, 2017** – Levandowski’s last day at Uber

DATED: January 30, 2018

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

By /s/ Charles K. Verhoeven

Charles K. Verhoeven
Attorneys for WAYMO LLC

¹ Waymo has been seeking to meet and confer with Defendants since November 26, when Waymo sent a proposed timeline. Defendants did not provide any substantive response until January 22.

EXHIBIT A

